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IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services

Sacramento Field Office

3310 El Camino Avenue, Suite 130
Sacramento, California 95821-6340

MAR 06 1997

February 25, 1997

Mr. Lester S. Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814

Subject: CALFED Bay-Delta Draft Environmental Restoration Program
Vision Document

Dear Mr. Snow:

We have reviewed the rough draft CALFED Environmental Restoration Program Vision document and have the following comments:

- (1) We have provided both specific and general comments directly to the groups involved in writing each section of the document.
- (2) Additionally, we have provided detailed species accounts and environmental baseline information to Frank Wernette of California Department of Fish and Game's Bay-Delta and Special Water Projects Division. This information should be included in environmental assessment documents that are prepared for the Service. It is also preliminary information required for the documentation associated with a Habitat Conservation Plan (HCP) currently seriously being considered as a means of providing assurances for the CALFED Bay-Delta Program (Program).
- (3) Our review indicates that the scope of the restoration program currently under consideration is not broad enough as the current program targets only in-Delta species and anadromous fish that are found in the upper San Joaquin, Sacramento, and other major rivers and tributaries. However, terrestrial species have declined due to direct, indirect, interdependent and interrelated water project facilities and operations. Species which have been affected include, but are not limited to, the threatened giant garter snake (*Thamnophis gigas*), valley elderberry longhorn beetle (*Desmoceros californiacus dimorphus*), San Joaquin kit fox (*Vulpes macrotis mutica*), and vernal pool species. Restoration of these species

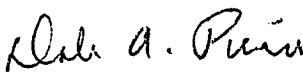
has not been addressed in documents prepared for the
Environmental Restoration Program Plan (ERPP) to date.

Our understanding of the purpose of the Restoration Program is to develop and implement a long term comprehensive plan that will restore ecological health and improve water management for beneficial uses of the Bay-Delta system. One of the stated objectives in the Purpose and Need Statement under Ecosystem Quality is to: "Contribute to the recovery of threatened or endangered species and species of special concern". Our understanding is that this goal, if achieved, is intended to improve the existing environmental baseline to an extent that the operation of existing facilities or the construction and operation of future water storage and conveyance facilities would then have less significant effects on the restored species. However, if out-of-Delta terrestrial species which have been adversely affected by water project facilities and deliveries are not restored and their current decline continues or increases, storage and conveyance alternatives may have significant adverse affects requiring substantial mitigation. This, in turn, could affect the ability of the Program to meet the Water Supply Reliability objective to: "Improve the predictability of the water supply available from the Bay-Delta system for beneficial use needs."

We strongly recommend proactively including all affected species in the restoration program to improve the environmental baseline for each of these species, thus truly restoring the affected ecosystem. We strongly recommend that you develop a proactive ERPP which addresses the needs of all species potentially affected by water project facilities, operations, and deliveries.

If you have any questions or concerns about the above, contact Robert Pine at (916) 979-2725 or Jean Elder at (916) 979-2129.

Sincerely,


for Wayne S. White
Field Supervisor

cc: ARD, Klamath and California Ecoregions, Region 1, Portland, OR
RD, Region 1, Portland
USEPA, San Francisco, CA